

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BRUNO HOFMANN, Individually And On Behalf Of
All Others Similarly Situated,

Plaintiff,

vs.

PHILIP LAUGHLIN, MICHAEL SABOLINSKI,
ALBERT ERANI, DONNA ABELLI LOPOLITO,
JOHN J. ARCARI, HERBERT M. STEIN, ALAN
ADES, BERNARD A. MARDEN, ALAN W. TUCK,
NOVARTIS PHARMA AG, and PRICE
WATERHOUSECOOPERS LLP,

Defendants.

Case No.: 1:04cv10027-JLT

[PROPOSED] SCHEDULING ORDER

Having considered Plaintiffs' Motion for Entry of Scheduling Order, dated August __, 2004 (the "Plaintiffs' Motion"), and good cause appearing therefore, the Court orders as follows:

1. Plaintiffs' Motion is granted.
2. Plaintiffs shall have up to and including sixty (60) days from the date of this Order to file and serve any consolidated amended complaint against any or all defendants in this action.
3. Defendants shall have up to and including sixty (60) days after the date on which the consolidated amended complaint is filed to move for dismissal or otherwise respond to the consolidated amended complaint.
4. If any defendant moves for dismissal of the consolidated amended complaint, Plaintiffs shall have up to and including forty-five (45) days after the date on which such motion is served to serve a response to such motion.

5. Defendants shall have up to and including twenty-one (21) days after the date on which plaintiffs serve their response to serve a reply.

IT IS SO ORDERED.

DATED:_____

United States District Court Judge